

PHILLIP A. TALBERT
United States Attorney
ALEXIS KLEIN
ROSS PEARSON
Assistant United States Attorney
501 I Street, Suite 10-100
Sacramento, CA 95814
Telephone: (916) 554-2700
Facsimile: (916) 554-2900

Attorneys for Plaintiff
United States of America

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

MARCUS MILLER,
REGINALD JONES,
FELICIA SHAW,
JIMMY VAN II, and
JAZZMINE CAMPBELL,

Defendants.

CASE NO. 2:23-CR-00150-DJC

STIPULATION AND ~~PROPOSED~~ ORDER TO
JOIN PROTECTIVE ORDER

STIPULATION

Plaintiff United States of America, by and through its counsel of record, and defendant Marcus Miller, by and through defendant's counsel of record Mike Long, hereby stipulate as follows:

1. On April 12, 2024, the Court approved a stipulated protective order regarding discovery in this case. ECF No. 60. At the time, Miller was represented by Linda Harter, who signed the stipulated protective order on his behalf and agreed to its terms. ECF No. 60 at 7.

2. On May 9, 2024, the Court ordered Michael Long to represent Miller and relieved Linda Harter from representation. Under the terms of the protective order, Mr. Long must join the protective order before any protected materials may be transferred to him by Ms. Harter. *See* ECF No. 60 at 7 ("In the event that there is a substitution of counsel prior to final disposition of the case, new counsel of

record must join this Protective Order before any Protected Materials may be transferred from the undersigned defense counsel to the new defense counsel.”).

3. By this stipulation, Mr. Long agrees that he will be bound by the terms of the protective order, and the protective order is incorporated to this stipulation by reference, ECF No. 60.

IT IS SO STIPULATED.

Dated: May 9, 2024

PHILLIP A. TALBERT
United States Attorney

/s/ ROSS PEARSON
ROSS PEARSON
Assistant United States Attorney

Dated: May 9, 2024

/s/ MICHAEL LONG
MICHAEL LONG
Counsel for Defendant
MARCUS MILLER
(Authorized by email on May 9,
2024)

ORDER

IT IS SO ORDERED

Dated: May 9, 2024



CAROLYN K. DELANEY
UNITED STATES MAGISTRATE JUDGE